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UTAH VHF SOCIETY
11560 SANDY CREEK DRIVE
SANDY, UTAH 84094

January 5, 1995

In the matter of:	)	
	)	
Allocation of Spectrum Below	)	ET Docket No. 94-32
5 GHZ Transferred from	)	
Federal Government Use	)	

NOTICE OF PROPOSED RULE MAKING

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
Washington, DC 20554

Re: Reallocation from government service to non-government service of spectrum shared with the Amateur Radio Service.

Dear Mr. Caton,

The Utah VHF Society is a Amateur Radio organization in the State of Utah that represents over 440 Amateur Radio Operators and over 550 Frequency Coordination Assignments for fixed relay systems. This does not include the additional thousands of amateur radio operators that rely on the use of these systems on a daily basis here in the State of Utah.

BACKGROUND

The Utah VHF Society was organized in 1968 to provide frequency coordination for fixed relay operations. The Utah VHF Society is the recognized official frequency coordinator for all Amateur radio fixed relay operations in the State of Utah.

We publish a directory that lists all Amateur Radio Repeaters in the State of Utah. Our Database is on file with the American Radio Relay League, Inc. (ARRL).

RESPONSE

All of the proposed plans presented to date using commercial services within the same band with amateur radio operations will disrupt the amateur service. We must remember that the Omnibus reconciliation Act mandates that the amateur service not be disrupted. This is outlined in your NPRM line 20. "The Reconciliation Act has directed the Department of Commerce to seek to avoid excessive disruption of the Amateur service and to determine the extent to which, in general, commercial users could share the frequency with amateur radio licensees."

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FREQUENCY COORDINATION

If the Amateur service is to share the spectrum with commercial services, one issue will be, how will frequency coordination between the Amateur and Commercial operations take place? One method would be to assign the Amateurs as primary for frequency coordination and to place the Amateur Coordinators in charge to coordinate frequencies that will be shared with the Commercial operator. To do anything less will eliminate amateur operation from the band.

OTHER SYSTEMS PROPOSED

We are opposed to the interference susceptible systems like the local loop service proposed by Southwestern Bell and others.

We are also opposed to the interference susceptible systems like the MDS system proposed.

Spread Spectrum interference resistance systems are favored to minimize interference to and from amateur operations.

The In-Flight Phone proposal was the most technically detailed but lacked the points of coordination between their operations and the amateurs. Frequency coordination would need to be co-primary with amateurs to insure continued use of amateur operations.

EXISTING UTAH COORDINATIONS

Frequency assignments have been made in Utah with respect to the SCRBBA 2300-2450 Mhz Band Plan. Several Wide Band point to point links are coordinated for use across the State of Utah.
Amateur Television activities are used across the State by individual amateur stations in the frequencies affected.

PUBLIC BENEFIT

The amateur radio spectrum 2,300-2,450 Mhz will provide a public service benefit that cannot be served by any commercial operation of the band.

The proposed reallocation will reduce or eliminate the public safety uses by the amateur service.

It would be advantageous to delay licensing of the 2390-2400 Mhz and 2402-2417 Mhz band so that the amateur service could then become the primary user. The 2300-2310 Mhz band could also be reallocated to primary status for the amateur service. Loss of these band segments will eliminate most of the uses of this band by the amateur service.

CONCLUSION

1) Reallocation of spectrum in the 2.3-2.45 Ghz band from government to commercial use will disrupt the present amateur activities in this band.

2) The spectrum from 2200-2290 could be allocated to amateurs as secondary to government operations. The Amateur service has set a presidence with government operations in sharing spectrum. Amateurs are proven to be acceptabel co-users of government spectrum.

2) The spectrum from 2,390-2,400 Mhz should be allocated to Amateur operations as a primary basis. Protection needs to be put in place for the weak signal and satellite amateur operations from 2,400-2,402 Mhz.

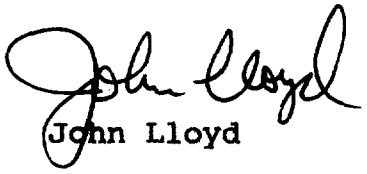
3) The spectrum from 2,400-2450 Mhz should be allocated to Amateur operations as primary basis.

4) The 2,400-2,450 Mhz spectrum should remain allocated to Part 15 operations on a secondary basis. No licensed commercial operations should be permitted in this band.

5) The NTIA report did not survey the actual and future use of the 2.3-2.45 Ghz band by the amateur service.

6) If the Amateur service is displaced, suitable spectrum needs to be made available. This is mandated by Title IV.

Sincerely,



John Lloyd

Utah VHF Society Frequency Coordinator